

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

JASON ADAM JENSEN,)
)
Plaintiff,)
)
v.) Case No. 6:22-CV-03140-BCW
)
CITIBANK, N.A., et. al.,)
)
Defendants.)

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant, the State of Missouri, respectfully asks this Court to extend their time to respond to Plaintiff's Amended Complaint, to Monday, December 5, 2022, for the following reasons:

1. On June 30, 2022, Plaintiff filed the Amended Complaint. (ECF No. 5-1.)
2. On November 4, 2022, the State of Missouri was served with the Amended Complaint.
3. The State of Missouri's response to the Amended Complaint is due on Friday, November 25, 2022.
4. Due to the Thanksgiving holiday and the undersigned counsel's current workload, counsel for Defendant requests a fourteen-day extension of time to respond to the Amended Complaint.

5. Plaintiff was contacted by phone on November 22, 2022 regarding this Motion for Extension of Time and agrees with the request for a fourteen-day extension.
6. The Court is able modify this deadline as part of its inherent power to manage and control its docket. *Cottrell v. Duke*, 737 F.3d 1238, 1248 (8th Cir. 2013) (internal citations omitted).
7. This is the State of Missouri's first request for an extension. It is made in good faith, is not intended to hinder or delay this action, and will not prejudice the Plaintiff in this case.

WHEREFORE, Defendant, the State of Missouri, respectfully asks this Court to grant this motion for an extension of time and extend their time to respond to the Amended Complaint to Monday, December 5, 2022, and for any other relief that it deems just and proper.

Respectfully submitted,

ERIC S. SCHMITT
Attorney General

/s/ Joyce A. Johnson
Joyce A. Johnson, Bar # 73778
Assistant Attorney General
Fletcher Daniels State Office Bldg.
615 E. 13th Street, Suite 401
Kansas City, MO 64106
Phone: (816) 889-5023
Fax: (816) 889-5006
Joyce.johnson@ago.mo.gov

*Attorney for Defendant State of
Missouri*

CERTIFICATE OF SERVICE

I hereby certify that on the day of November 22, 2022, the foregoing was filed electronically via the Court's electronic filing system and was served by operation of the e-filing system on all counsel of record and to Plaintiff at jasonajensen@gmail.com.

/s/ Joyce A. Johnson
Joyce A. Johnson
Assistant Attorney General